FDA Adverse Reaction Reporting System for Human Cells, Tissues and Cellular and Tissue-Based Products (HCT/Ps)

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FDA's Reporting Requirement: 21 CFR Part 1271.350-Effective May 25, 2005

- Manufacturers must ***investigate:***
  - ***Any*** adverse reaction involving a ***communicable disease*** related to an HCT/P that they made available for distribution.
- Manufacturers must ***report*** to FDA
  - An adverse reaction involving a communicable disease if it:
    - Is fatal
    - Is life-threatening
    - Results in permanent impairment of function or permanent damage to body structure; or
    - Necessitates medical or surgical intervention, including hospitalization

FDA's Reporting Requirements

- *Adverse reaction* means a noxious and unintended response to any HCT/P for which there is a reasonable possibility that the HCT/P caused the response
- To report adverse reactions, manufacturers must submit a MedWatch 3500A to FDA within 15 days of receipt of information
- And submit follow-up MedWatch report within 15 days of receipt of new information from the investigation

How are Adverse Reactions Reported to FDA?

- For **Manufacturers**:
  - Use Form **FDA 3500A** (MedWatch)
  - Report w/in 15 days of receipt of information
- For **Voluntary** reporters:
  - Use Form **FDA 3500** (MedWatch)
  - Also promptly report to HCT/P establishments
- FDA MedWatch reporting system
  - http://www.fda.gov/medwatch

What Information to Include on MedWatch Report

- Specific name and type of product used
- Recipient outcomes (symptoms, medical or surgical interventions, recovery, morbidity, death)
- Indicators that adverse reaction was related to a communicable disease
- Relevant dates
- Results of cultures and other relevant studies
- Devices implanted

What Information to Include on MedWatch Report (cont.)

- Special handling/prep of product at implanting facility
- Confirmation that donor met eligibility requirements and HCT/P met release criteria
- Recipient risk factors for infection
- If other recipients of donor tissue had adverse reactions (review of complaint file)
- Impression of likelihood that adverse reaction was related to product (reasonable possibility)

Other Information to Review in Investigation and Make Available to FDA if Requested

- Donor screening records
- Did any deviations from facility's SOP occur in donor tissue processing
- Copies of pre- and post-processing cultures of donor tissue
- Copies of relevant recipient culture, serology, pathology and imaging results, clinic and operative notes
- Copies of culture results from other recipients of donor's tissue
- Results of hospital infection control investigation, if applicable

Common Problems with MedWatch Reports

- Manufacturer reporting on voluntary form (3500) instead of mandatory form (3500A)
- Reporting of device information in product section (and the reverse)
- Insufficient information about the adverse reaction
- Reporting of product problems when product was not implanted
- Failure to submit a follow-up report

U.S. Food and Drug Administration

Department of Health and Human Services

CENTER FOR BIOLOGICS EVALUATION AND RESEARCH

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